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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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*Attorneys for the Plaintiff
 The United States of America*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JENNIFER MICHELLE ELWARD,

Defendant.

3:20-CR-0042-MMD-CLB

CRIMINAL INDICTMENT

VIOLATION:

18 U.S.C. §§ 922(a)(6) and 924(a)(2) –
 Illegal Acquisition of a Firearm.

THE GRAND JURY CHARGES THAT:

COUNT ONE

**Illegal Acquisition of a Firearm
 (18 U.S.C. §§ 922(a)(6), 924(a)(2))**

On or about July 13, 2020, in the State and Federal District of Nevada,

JENNIFER MICHELLE ELWARD,

defendant herein, in connection with the acquisition of a firearm, that is: an Iberia
 Firearms, JCP, .40 caliber pistol bearing serial number X7111357; a Taurus, PT111G2A,
 9mm pistol bearing serial number ABD490359; a Taurus, PT111G2, 9mm pistol bearing
 serial number TKW04245; and a Taurus, GS2, 9mm pistol bearing serial number

1 ABE622240, from Cabela's, a licensed dealer of firearms within the meaning of Chapter 44
2 of Title 18, United States Code, knowingly made and caused to be made a false and
3 fictitious written statement to Cabela's, which statement was intended and likely to deceive
4 Cabela's as to a fact material to the lawfulness of the sale of said firearm under Chapter 44
5 of Title 18, United States Code, in that JENNIFER MICHELLE ELWARD did complete
6 and execute a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms
7 Transaction Record, wherein JENNIFER MICHELLE ELWARD represented that she
8 was the actual transferee/buyer of the firearms, when in fact, and as the defendant well
9 knew, she was not the actual transferee/buyer of the firearms and was buying them for
10 another person, all in violation of Title 18, United States Code, Sections 922(a)(6) and
11 924(a)(2).

12 **COUNT TWO**

13 **Illegal Acquisition of a Firearm**
14 **(18 U.S.C. §§ 922(a)(6), 924(a)(2))**

15 On or about July 17, 2020, in the State and Federal District of Nevada,

16 JENNIFER MICHELLE ELWARD,

17 defendant herein, in connection with the acquisition of a firearm, that is: a Taurus, G2,
18 9mm pistol bearing serial number ABG655727 and a SCCY, GPX-2, 9mm pistol bearing
19 serial number 915733, from RAC Guns & Ammo, a licensed dealer of firearms within the
20 meaning of Chapter 44 of Title 18, United States Code, knowingly made and caused to be
21 made a false and fictitious written statement to RAC Guns & Ammo, which statement was
22 intended and likely to deceive RAC Guns & Ammo as to a fact material to the lawfulness
23 of the sale of said firearm under Chapter 44 of Title 18, United States Code, in that
24 JENNIFER MICHELLE ELWARD did complete and execute a Bureau of Alcohol,
Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record, wherein
JENNIFER MICHELLE ELWARD represented that she was the actual transferee/buyer
of the firearms, when in fact, and as the defendant well knew, she was not the actual

1 transferee/buyer of the firearms and was buying them for another person, all in violation of
2 Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

3
4 **COUNT THREE**

5 **Illegal Acquisition of a Firearm**
6 **(18 U.S.C. §§ 922(a)(6), 924(a)(2))**

7 On or about July 17, 2020, in the State and Federal District of Nevada,

8 JENNIFER MICHELLE ELWARD,

9 defendant herein, in connection with the acquisition of a firearm, that is: a Springfield
10 Armory, XD-9, 9mm pistol bearing serial number BY242717, from Reno Guns & Range, a
11 licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States
12 Code, knowingly made and caused to be made a false and fictitious written statement to
13 Reno Guns & Range, which statement was intended and likely to deceive Reno Guns &
14 Range as to a fact material to the lawfulness of the sale of said firearm under Chapter 44 of
15 Title 18, United States Code, in that JENNIFER MICHELLE ELWARD did complete
16 and execute a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms
17 Transaction Record, wherein JENNIFER MICHELLE ELWARD represented that she
18 was the actual transferee/buyer of the firearm, when in fact, and as the defendant well
19 knew, she was not the actual transferee/buyer of the firearm and was buying it for another
20 person, all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

21 **COUNT FOUR**

22 **Illegal Acquisition of a Firearm**
23 **(18 U.S.C. §§ 922(a)(6), 924(a)(2))**

24 On or about July 17, 2020, in the State and Federal District of Nevada,

JENNIFER MICHELLE ELWARD,

defendant herein, in connection with the acquisition of a firearm, that is: a Glock, Model
19, 9mm pistol bearing serial number BPHA297 and a Smith & Wesson, SD9VE, 9mm

1 pistol bearing serial number FCE3710, from Juggernaut Arms, a licensed dealer of firearms
2 within the meaning of Chapter 44 of Title 18, United States Code, knowingly made and
3 caused to be made a false and fictitious written statement to Juggernaut Arms, which
4 statement was intended and likely to deceive Juggernaut Arms as to a fact material to the
5 lawfulness of the sale of said firearm under Chapter 44 of Title 18, United States Code, in
6 that JENNIFER MICHELLE ELWARD did complete and execute a Bureau of Alcohol,
7 Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record, wherein
8 JENNIFER MICHELLE ELWARD represented that she was the actual transferee/buyer
9 of the firearms, when in fact, and as the defendant well knew, she was not the actual
10 transferee/buyer of the firearms and was buying them for another person, all in violation of
11 Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

12 **COUNT FIVE**

13 **Illegal Acquisition of a Firearm**
14 **(18 U.S.C. §§ 922(a)(6), 924(a)(2))**

15 On or about July 17, 2020, in the State and Federal District of Nevada,

16 JENNIFER MICHELLE ELWARD,

17 defendant herein, in connection with the attempted acquisition of a firearm, that is: a
18 Canik55/Century Arms, TP9SF bearing serial number 20BH11663 and a Taurus, G3,
19 9mm pistol bearing ABE570211, from Sportsman's Warehouse, a licensed dealer of
20 firearms within the meaning of Chapter 44 of Title 18, United States Code, knowingly
21 made and caused to be made a false and fictitious written statement to Sportsman's
22 Warehouse, which statement was intended and likely to deceive Sportsman's Warehouse
23 as to a fact material to the lawfulness of the sale of said firearm under Chapter 44 of Title
24 18, United States Code, in that JENNIFER MICHELLE ELWARD did complete and
execute a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms
Transaction Record, wherein JENNIFER MICHELLE ELWARD represented that she
was the actual transferee/buyer of the firearms, when in fact, and as the defendant well

1 knew, she was not the actual transferee/buyer of the firearms and was buying them for
2 another person, all in violation of Title 18, United States Code, Sections 922(a)(6) and
3 924(a)(2).

4 **COUNT SIX**
5 **Illegal Acquisition of a Firearm**
6 **(18 U.S.C. §§ 922(a)(6), 924(a)(2))**

7 On or about July 17, 2020, in the State and Federal District of Nevada,

8 JENNIFER MICHELLE ELWARD,

9 defendant herein, in connection with the attempted acquisition of a firearm, that is: a Hi
10 Point, JHP, .45 caliber pistol bearing serial number X4367660 and a Hi Point, C9, 9mm
11 pistol bearing serial number P10088266, from Bizarre Guns, a licensed dealer of firearms
12 within the meaning of Chapter 44 of Title 18, United States Code, knowingly made and
13 caused to be made a false and fictitious written statement to Bizarre Guns, which statement
14 was intended and likely to deceive Bizarre Guns as to a fact material to the lawfulness of
15 the sale of said firearm under Chapter 44 of Title 18, United States Code, in that
16 JENNIFER MICHELLE ELWARD did complete and execute a Bureau of Alcohol,
17 Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record, wherein
18 JENNIFER MICHELLE ELWARD represented that she was the actual transferee/buyer
19 of the firearms, when in fact, and as the defendant well knew, she was not the actual
20 transferee/buyer of the firearms and was buying them for another person, all in violation of
21 Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

22 **COUNT SEVEN**
23 **Illegal Acquisition of a Firearm**
24 **(18 U.S.C. §§ 922(a)(6), 924(a)(2))**

On or about July 30, 2020, in the State and Federal District of Nevada,

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JENNIFER MICHELLE ELWARD,
defendant herein, in connection with the attempted acquisition of a firearm, that is: a
Taurus, PT111GSA, 9mm pistol bearing serial number ABG650598 and a Taurus, G2S,
9mm pistol bearing serial number ABB316721, from Cabela's, a licensed dealer of firearms
within the meaning of Chapter 44 of Title 18, United States Code, knowingly made and
caused to be made a false and fictitious written statement to Cabela's, which statement was
intended and likely to deceive Cabela's as to a fact material to the lawfulness of the sale of
said firearm under Chapter 44 of Title 18, United States Code, in that JENNIFER
MICHELLE ELWARD did complete and execute a Bureau of Alcohol, Tobacco, Firearms
and Explosives Form 4473 Firearms Transaction Record, wherein JENNIFER
MICHELLE ELWARD represented that she was the actual transferee/buyer of the
firearms, when in fact, and as the defendant well knew, she was not the actual
transferee/buyer of the firearms and was buying them for another person, all in violation of
Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

DATED: this 3rd day of September, 2020.

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

NICHOLAS A. TRUTANICH
United States Attorney


MEGAN RACHOW
Assistant United States Attorney